

# Exhibit H

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat  
Brown

**DECLARATION OF DACHE WILLIAMS**

I, DaChe Williams, under oath, declare as follows:

1. I am a current student-athlete and a sophomore member of the women's basketball team at Northeastern University in Boston, Massachusetts. I play guard for the basketball team and have suffered two concussions while at Northeastern. I am not related to any of the lawyers currently representing the parties in this matter. I have not been promised any compensation for my participation in this matter. I have full knowledge of the matters stated herein and could and would testify hereto if necessary.

2. I received and reviewed the Amended Settlement Agreement in this matter. I was asked to review the Settlement Agreement on behalf of current NCAA student-athletes to determine if the Settlement is fair, adequate and reasonable.

3. I can attest from personal experience that concussions are extremely serious. Concussions can and do occur in sports other than football and are common in basketball. When concussions occur, they can be devastating and have a profound effect on a student-athlete's health regardless of the sport they play. Therefore, the Settlement should cover players in all sports.

4. During my freshman year, I was elbowed in the head by a teammate in practice and was knocked unconscious. I was treated by the training staff at Northeastern and I was not allowed to return to play until my symptoms resolved. However, I sustained a second concussion during a game later in the season. I was diagnosed with a concussion by the training staff and doctors who subsequently prohibited me from returning to play. As a result of these two concussions, I did not play during my sophomore season and have been told by doctors that one more concussion could end my career.

5. Despite my disappointment with being unable to play, I understand that my health takes precedence over basketball and my academic career is just as important – if not more important – than my basketball career.

6. I am extremely grateful for this Settlement because it will require that all schools handle concussions in the proper manner and implement universal concussion management procedures.

7. Accordingly, I believe that all current and former student-athletes should have access to the Medical Monitoring Program – regardless of the sport they played. The ability to obtain access to the diagnostic program provided under the Settlement is a valuable benefit for both current and former student-athletes.

8. As I can attest to from personal experience, it is especially important for medical personnel to be present at all contact sports games.

9. In addition, it is also extremely important that the Settlement requires that all student-athletes, regardless of sport, obtain medical clearance prior to returning to play.

10. Finally, the requirement that the NCAA provide education for faculty regarding academic accommodations for student-athletes suffering from concussions is also very

important. Following my injuries, it was extremely difficult to focus and study which caused me to struggle with classes and school work.

11. Based on my personal experiences, I want to be a class representative to ensure that all student-athletes regardless of sport receive proper concussion management. I think that the Settlement will ensure that student-athletes are handled with the proper concussion management procedures and also will provide medical screening for athletes who are struggling because of concussion symptoms.

Date: March 31, 2015

DaChe Williams  
